

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

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|--|---|----------------------------|
| JANELLE HILL, and |) | |
| WILLIAM HILL, |) | |
| Individually and as the Next Friends of |) | |
| SAVANNAH A. HILL, |) | |
| |) | |
| Plaintiffs |) | |
| v. |) | Civil No. 1:09cv463 |
| |) | |
| SANOFI-AVENTIS U.S., INC. |) | |
| |) | |
| Defendant |) | |
| _____ |) | |

PLAINTIFFS' DESIGNATION OF EXPERT WITNESSES

COME NOW, the Plaintiffs, Janelle Hill and William Hill, individually and as Next Friends of Savannah A. Hill, by counsel, and designate the individuals set forth below to be called as expert witnesses on their behalf in the trial of this case.

NOTE: Inasmuch as discovery is ongoing in this action, some of the materials set forth herein will require supplementation and/or amendment as information and documentation is obtained from the Defendant and/or from independent sources. Moreover, the Plaintiffs and their counsel are of the opinion that the Defendant has deliberately limited the disclosures and document productions it has provided in discovery to date in the most rigorous manner possible, so as to obstruct the Plaintiffs in the preparation of their case and prevent the Plaintiffs from obtaining the information and documentation needed for them to comply with the Court's requirements and expectations of the Plaintiffs whenever possible. The purpose of reciting this caveat at the present juncture is to apprise the Court of these concerns at the earliest possible point

in time, and to ask the Court to bear them in mind at such time as the Plaintiffs are in a position to make the above-described supplementation and/or amendment to the materials set forth herein.

The Plaintiffs' designations of expert witnesses and testimony at this time are as follows:

1. Susan Riddick- Grisham, Life Care Planner. 3126 West Cary Street, Richmond Virginia, 23221. Phone: 804-310-5239

The subject matter of Ms. Riddick-Grisham's testimony will be the nature and costs of care that will be required for Savannah A. Hill, the minor child whose injuries are the subject of this action, throughout her life. Ms. Susan Riddick-Grisham will testify as to the measures that will need to be taken and expenditures that will be required for evaluation, therapy, diagnostic testing, educational assessment, wheelchair and other aids to independent functioning, orthotics, prosthetics, home furnishings and care, medical care, transportation, therapeutic recreation and architectural renovations.

Ms. Susan Riddick Grisham's testimony will be consistent with her Report, a copy of which is attached hereto and incorporated by reference.

Ms. Susan Riddick Grisham's opinions and testimony will be based on her training and experience and her review of extensive records, as described in her attached Report.

2. Dr. Robert Sklaroff- Hematologist. 50 East Township Line Road, Suite 130, Elkins Park, Pennsylvania, 19027-2253. Phone: 215-663-8200

The subject matter of Dr. Sklaroff's testimony will be the inadequacy of warnings provided by the Defendant for the use of the drug Lovenox, especially as applied to this

particular case, the inappropriate marketing of Lovenox by the Defendant for use by women during pregnancy, the misleading of doctors by the Defendant as to what monitoring of women using Lovenox during pregnancy is or is not needed, and other inappropriate aspects of the design, testing manufacture and marketing of Lovenox by the Defendant.

Dr. Sklaroff's testimony will be consistent with his Reports, copies of which are attached and incorporated herein by reference

. Dr. Sklaroff's opinions and testimony will be based on his training and experience and his review of extensive records, as described in his attached Reports.

3. Dr. Eldon Nyhart- Pharmacologist and Toxicologist. P.O. Box 5045, Zionsville, Indiana, 46077. Phone: 317-506-7000

The subject matter of Dr. Nyhart's testimony will be the pharmacological processes by which Lovenox produces injurious results from its use during pregnancy, as was the case in the present action. Dr. Nyhart's testimony will be consistent with his Report, a copy of which is attached hereto and incorporated by reference.

Dr. Nyhart's opinions and testimony will be based on his training and experience and his review of records pertaining to this case.

4. Dr. Paul Sinkhorn- OB/GYN. 2642 Marley Drive, Riverside, California, 92506. Phone: 909-241-2745

The subject matter of Dr. Sinkhorn's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during her pregnancy.

Dr. Sinkhorn's testimony will be consistent with his Report, which will be provided to Defendant's counsel in response to discovery. His CV is attached.

Dr. Sinkhorn's opinions and testimony will be based on his training and experience and his review of records pertaining to this case.

5. Dr. David Priver- OB/GYN 500 West Harbor Drive, Suite 721, San Diego, California 92101. Phone: 619-987-3092

The subject matter of Dr. Priver's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during her pregnancy.

Dr. Priver's testimony will be consistent with his Report, which will be provided to Defendant's counsel in response to discovery. His CV is attached.

Dr. Priver's opinions and testimony will be based on his training and experience and his review of records pertaining to this case.

6. Dr. Jerry Bush- Internal Medicine and Pharmacology/Toxicology. McIntosh Trial Family Practice, 747 South Hill Street, Griffin, Georgia 30224 Phone: 770-228-5407

The subject matter of Dr. Jerry Bush's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during her pregnancy.

Dr. Bush's testimony will be consistent with his Report, which will be provided to Defendant's counsel in response to discovery. His CV is attached.

Dr. Bush's opinions and testimony will be based on his training and experience and his review of records pertaining to this case.

7. Dr. James Lemons- Perinatology/ Neonatology. Riley Children's Hospital, RR
208, 699 West Drive, Indianapolis, Indiana 46202-5119 Phone: 317-274-4716

The subject matter of Dr. James Lemon's testimony will be the complications of Plaintiff Janelle Hill's pregnancy and delivery, as a result of the use of Lovenox during her pregnancy and the resulting injuries to Savannah A. Hill, the minor child whose injuries are the subject of this action.

Dr. Lemon's testimony will be consistent with his Report, which will be provided to Defendant's counsel in response to discovery. His CV is attached.

Dr. Lemon's opinions and testimony will be based on his training and experience and his review of records pertaining to this case.

Respectfully submitted,
Janelle B. Hill
William David Hill
Individually and as the Next
Friends
of Savannah Hill
By Counsel

/s/ Spencer D. Ault
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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of July, 2009, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, and sent a copy by electronic mail to:

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/s/ Spencer D. Ault
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